

CTJ/RMT
LWO**ORIGINAL**FILED
U.S. DISTRICT COURT
NORTHERN DIST. OF TX
FT. WORTH DIVISION

2007 AUG 24 AM 9:36

CLERK OF COURT

In re:

AGAPE CHRISTIAN FELLOWSHIP OF
ARLINGTON,

Debtor,

RAE LYNN YANCY, *et. al.*,

Plaintiffs,

v.

AGAPE CHRISTIAN FELLOWSHIP OF
ARLINGTON,

Defendant.

CASE NO. 07-40983-dml-11

(Bankruptcy Court Number)

NO. 4:07-CV-291-A
(District Court Number)(Consolidated with
District Court Cause
No. 4:07-CV-401-A)**JOINT MOTION TO EXTEND CERTAIN PROVISIONS OF SCHEDULING ORDER**

COME NOW Agape Christian Fellowship of Arlington (the “Debtor”), Alexus Jones, Krystal Buchanan, Rosita Sterling, and Joycelyn Lloyd (collectively, the “Claimants”, together with the Debtor, the “Parties”), and file this their *Joint Motion to Extend Certain Provisions of Scheduling Order* (the “Motion”), respectfully stating as follows:

1. On August 7, 2007, the Court filed its *Revised Scheduling Order* (the “Scheduling Order”). Pursuant to the Scheduling Order, the Claimants are required to amend their bankruptcy claims, in the nature of a civil complaint filed with this Court, by August 21, 2007. The Debtor is required to file an answer thereto by August 30, 2007.
2. The Parties have conferred and, for reasons related to ongoing discovery and to ensure the filing of effective and meaningful live pleadings, have agreed to request an extension of these deadlines in the Scheduling Order.

3. Specifically, the Parties request, by the proposed agreed order attached hereto, that the Claimants' deadline to file their complaint, as provided for in paragraph 1 of the Scheduling Order, be extended to **September 4, 2007**, and that the Debtor's deadline to file an answer thereto be extended to **September 10, 2007**. The Parties do not request any modification of any other deadline or provision of the Scheduling Order at this time.

4. The Parties seek this relief in order that justice may be done and the Court's judicial economy preserved by ensuring the filing of effective pleadings, and not for purposes of delay or for any other purpose. Granting said relief will not prejudice the Parties in ongoing discovery, and will not result in continuing the other dates in the Scheduling Order, including the setting of trial for this matter. Thus, said relief is not prejudicial to the Court or to its docket.

WHEREFORE, PREMISES CONSIDERED, the Parties respectfully request that the Court grant this Motion by entering the proposed agreed order attached hereto.

Respectfully submitted this 23d day of August, 2007.

MUNSCH HARDT KOPF & HARR, P.C.

By: _____

Davor Rukavina, Esq.
Texas Bar No. 24030781
3800 Lincoln Plaza
500 N. Akard Street
Dallas, Texas 75201
Telephone: (214) 855-7500
Facsimile: (214) 855-7584

ATTORNEYS FOR THE
DEBTOR-IN-POSSESSION

LAW OFFICES OF G. LEE FINLEY, P.C.

By: _____

G. Lee Finley, w/ permission by
Davor Rukavina
G. Lee Finley, Esq.
Texas Bar No. 24014609
P.O. Box 1307
Coppell, Texas 75019
Telephone: (214) 295-6185
Facsimile: (214) 257-8925

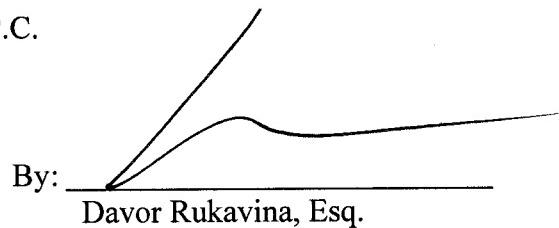
ATTORNEYS FOR JOYCELYN
LLOYD, ROSITA STERLING,
KRISTAL BUCHANAN, AND
ALEXUS JONES

CERTIFICATE OF SERVICE

The undersigned hereby certifies that, on this the 23d day of August, 2007, he caused a true and correct copy of this motion, together with the proposed agreed order thereon, to be served by U.S. first class mail, postage prepaid, on the following:

Counsel for Claimants:

G. Lee Finely, Esq.
The Law Offices of G. Lee Finley, P.C.
P.O. Box 1307
Coppell, Texas 75019

By: 
Davor Rukavina, Esq.